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4 Plaintiff in Pro Per

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 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN FRANCISCO DIVISION

11 SALLY STEINHART,

No. CV-10-00841 RS

12 Plaintiff,

13 v.

14 COUNTY OF SONOMA, et al.,

15 Defendants.

**SECOND STIPULATION FOR  
 ORDERS TO: (1) CONTINUE  
 HEARING ON MOTIONS TO DISMISS  
 AND TO STRIKE; (2) EXTEND  
 BRIEFING SCHEDULES; AND (3)  
 CONTINUE CASE MANAGEMENT  
 CONFERENCE; [~~PROPOSED~~] ORDER**

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 17 This joint stipulation is entered into by and between Plaintiff in pro per, Sally Steinhart  
 18 (“Plaintiff”), and Defendants the County of Sonoma, former Sheriff-Coroner William Cogbill, and  
 19 County employees Michael Shanahan, Brian K. Covington, Caroline Jaap, Jo Weber, Nicholas  
 20 Honey, Jerry Allen, Betty Johnson and Robin Smith (collectively, “County Defendants”). Through  
 21 this second stipulation, these parties request the Court to enter an order: (1) continuing the hearing  
 22 on the pending Motion to Dismiss Third Amended Complaint, and Anti-SLAPP Motion to Strike, to  
 23 October 27, 2011; (2) extending the briefing schedule on such Motions to permit Plaintiff to file her  
 24 oppositions through September 26, 2011, and for County Defendants to file their replies through  
 25 October 7, 2011; and (3) continuing the Case Management Conference, currently set for September  
 26 29, 2011, to October 27, 2011, at 1:30 p.m., to enable it to be heard at the same time as the pending  
 27 Motions. Defendant the State Department of Social Services and other named defendants have not  
 28 appeared in this action, and are not parties to this stipulation.

**RECITALS**

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2           A.       Plaintiff initiated this action on February 26, 2010, and later filed her Third Amended  
3 Complaint for Declaratory and Injunctive Relief and Damages on June 27, 2011 (Dkt. No. 46, the  
4 “TAC”). In response, on July 29, 2011, County Defendants filed their Motion to Dismiss the TAC  
5 (Dkt. No. 47) and Anti-SLAPP Motion to Strike under CCP § 425.16 (Dkt. No. 50), collectively  
6 referred to herein as the “Motions”.

7           B.       Pursuant to a previous stipulation of the parties approved by the Court, Plaintiff’s  
8 time to file her oppositions to the Motions was extended through August 31, 2011, County  
9 Defendants’ time to file their replies was extended through September 8, 2011, and the hearings  
10 were continued to September 29, 2011 (Dkt. No. 53). In addition, the Court also approved the  
11 parties’ stipulation to hold the initial Case Management Conference at the same time as the hearing  
12 on the Motions, on September 29, 2011, at 1:30 p.m. (*Id.*)

13           C.       Plaintiff has requested additional time in which to prepare and file her oppositions to  
14 the Motions through September 26, 2011, as she is in the process of moving her office and has not  
15 been able to complete such oppositions in time to meet current deadlines. County Defendants have  
16 consented to Plaintiff’s requested extension of time, and Plaintiff has agreed to extend County  
17 Defendants’ time in which to file their replies to the Motions through October 7, 2011. The parties  
18 agree that, aside from the dates set forth in Section B, above, there are no other dates or scheduling  
19 issues that affect the requested extensions of time.

20           D.       Based on the requested extension of the briefing schedule, the parties also request that  
21 the hearing on the pending Motions, currently set for September 29, 2011, be continued to October  
22 27, 2011, at 1:30 p.m., and that the initial Case Management Conference be continued to that date  
23 and time as well.

24           WHEREFORE, the parties to this stipulation hereby agree and request entry of a Court order  
25 as follows:

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**STIPULATION**

1  
2 1. The hearing on County Defendants' pending Motion to Dismiss the TAC (Dkt. No.  
3 47) and Anti-SLAPP Motion to Strike under CCP § 425.16 (Dkt. No. 50) be continued to October  
4 27, 2011, at 1:30 p.m.

5 2. The briefing schedule on such Motions be extended to permit Plaintiff to file her  
6 oppositions through September 26, 2011, and for County Defendants to file their replies through  
7 October 7, 2011.

8 3. The Case Management Conference, currently set for September 29, 2011, be  
9 continued to October 27, 2011, at 1:30 p.m. A joint case management conference statement shall be  
10 filed one week prior to the conference.

11 4. This stipulation does not prevent or preclude the parties from seeking additional relief  
12 from this Court, to amend this stipulation and order or otherwise.

13 Respectfully submitted,

14 Dated: August 30, 2011

Bruce D. Goldstein, County Counsel

15 By: /s/ Anne L. Keck  
16 Anne L. Keck, Deputy County Counsel  
17 Attorneys for County Defendants

18 Dated: August 30, 2011

Sally Steinhart, Plaintiff in pro per

19 By: /s/ Sally Steinhart  
20 Sally Steinhart  
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**[PROPOSED] ORDER**

Pursuant to and in accordance with the foregoing Stipulation, and with good cause appearing, it is hereby ordered as follows:

1. The hearing on County Defendants' pending Motion to Dismiss the TAC (Dkt. No. 47) and Anti-SLAPP Motion to Strike under CCP § 425.16 (Dkt. No. 50) is continued to October 27, 2011, at 1:30 p.m.

2. The briefing schedule on such Motions is extended to permit Plaintiff to file her oppositions through September 26, 2011, and for County Defendants to file their replies through October 7, 2011.

3. The Case Management Conference, currently set for September 29, 2011, is continued to October 27, 2011, at 1:30 p.m. A joint case management conference statement shall be filed one week prior to the conference.

IT IS SO ORDERED.

Date: 8/31/11

  
HONORABLE RICHARD SEEBORG  
United States District Judge